

**UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND**

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IN RE APPLICATION OF EURASIAN :
NATURAL RESOURCES CORP. LTD. :

20 Farringdon Street :
London, EC4A 4AB :
United Kingdom :

Case No.

Petitioner, :

for an order pursuant to 28 U.S.C. § 1782 to :
conduct discovery for use in a foreign :
proceeding. :

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***EX PARTE* APPLICATION FOR AN ORDER PURSUANT TO 28 U.S.C. § 1782
TO CONDUCT DISCOVERY FOR USE IN A FOREIGN PROCEEDING**

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Eurasian Natural Resources Corporation Limited (“Petitioner”) respectfully submits this application *ex parte* for an order pursuant to 28 U.S.C. § 1782 (“Section 1782”) permitting Petitioner to seek discovery for use in a civil proceeding currently pending in the United Kingdom (“Petition”). Petitioner respectfully requests that the Court endorse the proposed order attached hereto as Exhibit A, authorizing it to serve the subpoena for documents and testimony attached hereto as Exhibit B on Glenn Simpson.

For the reasons set forth in the concurrently-filed Memorandum of Law submitted in support of the Petition, the Petition meets each of Section 1782’s statutory requirements, and also satisfies each of the discretionary factors that courts consider in deciding whether to authorize discovery under Section 1782. The Petition is further supported by the concurrently-filed Declaration of Justin Michaelson and the exhibits attached thereto.

Dated: December 5, 2019
Washington, D.C.

Respectfully submitted,

CLEARY GOTTlieb STEEN & HAMILTON LLP

MORVILLO ABRAMOWITZ GRAND IASON &
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/s/ Nowell D. Bamberger

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